BLOCKBEN

TABLE OF CONTENTS

I.01: Date of notification

2026.07.09.

I.02: Statement in accordance with Article 6(3) of Regulation (EU) 2023/1114

This crypto-asset white paper has not been approved by any competent authority in any Member State of the European Union. The offeror and person seeking admission to trading of the crypto-asset is solely responsible for the content of this crypto-asset white paper.

I.03: Compliance statement in accordance with Article 6(6) of Regulation (EU) 2023/1114

This crypto-asset white paper complies with Title II of Regulation (EU) 2023/1114 and, to the best of the knowledge of the management body, the information presented in the crypto-asset white paper is fair, clear and not misleading and the crypto- asset white paper makes no omission likely to affect its import.

I.04: Statement in accordance with Article 6(5), points (a), (b), (c) of Regulation (EU) 2023/1114

The crypto-asset referred to in this white paper may lose its value in part or in full, may not always be transferable and may not be liquid.

I.05: Statement in accordance with Article 6(5), point (d) of Regulation (EU) 2023/1114

The utility token referred to in this white paper may not be exchangeable against the good or service promised in this white paper, especially in the case of a failure or discontinuation of the crypto-asset project.

I.06: Statement in accordance with Article 6(5), points (e) and (f) of Regulation (EU) 2023/1114

The crypto-asset referred to in this white paper is not covered by the investor compensation schemes under Directive 97/9/EC of the European Parliament and of the Council. The crypto-asset referred to in this white paper is not covered by the deposit guarantee schemes under Directive 2014/49/EU of the European Parliament and of the Council.

Summary	
I.07: Warning in accordance with Article 6(7), second subparagraph of Regulation (EU) 2023/1114	Warning: This summary should be read as an introduction to the crypto- asset white paper. The prospective holder should base any decision to purchase this crypto – asset on the content of the crypto- asset white paper as a whole and not on the summary alone. The offer to the public of this crypto- asset does not constitute an offer or solicitation to purchase financial instruments and any such offer or solicitation can be made only by means of a prospectus or other offer documents pursuant to the applicable national law. This crypto-asset white paper does not constitute a prospectus as referred to in Regulation (EU) 2017/1129 of the European Parliament and of the Council or any other offer document pursuant to Union or national law.
I.08: Characteristics of the crypto-asset	Holoverz (3DHT) is a digital utility token issued by BlockBen SIA, designed to give users access to exclusive 3D holographic collectible products on the BlockBen platform. The token is not an investment and does not carry any ownership, profit-sharing, or governance rights. Purchaser Rights and Obligations: • Purchasers can use 3DHT tokens to redeem specific collectibles made available on the platform. • Retail purchasers have the right to withdraw from the purchase within 14 calendar days, in line with MiCAR regulations. • The pre-sale phase of the 3DHT token has been concluded and 3DHT tokens are no longer available for direct purchase from the issuer or through the BlockBen platform. • Token holders are required to maintain a verified BlockBen Wallet and follow KYC procedures. • 3DHT tokens are not transferable during the pre-sale period. • External transfers, trading on external trading venues, and public sale functionality are currently not enabled. How to Exercise Rights: • Withdrawal rights must be exercised via email or the platform interface within 14 days of purchase. • Redemption of tokens is done through the BlockBen Wallet, or by selecting available collectibles and confirming the transaction, by referring the purchase number received on the holoverz.shop and confirming the transaction Modifications to Rights or Obligations: • BlockBen may modify token-related rights or platform access due to regulatory updates, platform upgrades, or service adjustments. • Any material changes will be communicated to purchasers in advance via the BlockBen website , wallet interface or via email, and in some cases, may re-trigger withdrawal rights.
I.09.: Statement in accordance with Article 6(5), point (d) of Regulation (EU) 2023/1114.	The issuer declares that, to the best of its knowledge, the information contained in this crypto-asset white paper is fair, clear, and not misleading, and that it contains all material information necessary for prospective holders of the crypto-

	assets to make an informed decision, in accordance with Article 6(5)(d) of Regulation (EU) 2023/1114)
I.10: Key information about the offer to the public or admission to trading	Holoverz (3DHT) was offered to the public by BlockBen SIA. It provides access to exclusive limited-edition 3D holographic collectible products via the BlockBen platform. Token Supply & Pricing: • Total token supply: 8,380,000 3DHT • The historic initial issue price during the public pre-sale phase was 6.99 EUR per tokenThis initial price was valid for a period of 30 calendar days from the launch of the public offer • After this period, the price increased daily by 0.11%, reflecting growing access demand and token utility • No additional subscription fees apply Subscription Period & Offer Phases: • The historic subscription period (pre-MiCAR regime) began on 28 June 2023 (under BlockBen UAB, Lithuania) • and the previous subscription period, the public pre-sale phase under BlockBen SIA (Latvia) concluded on 01.04.2026 • Post-sale Phase: Transfer and potential trading functionality is activated. Eligible Purchasers: • The offer is open to retail and professional clients across the EU, subject to KYC/AML verification Offering Structure: • 3DHT tokens are administered and accessible exclusively through the BlockBen Wallet ecosystem operated by BlockBen SIA • Internal transfers are currently limited to verified BlockBen Wallet users within the closed BlockBen ecosystem

Part A - Information about the offeror or the person seeking admission to trading	
A.1: Name	Gicouranian Limited
A.2: Legal form	Limited Company ISO 20275 ELF Code: INTY
A.3: Registered address	Pavlou Valdaseridi, 2a, Larnaca, Cyprus
A.4: Head office	Pavlou Valdaseridi, 2a, Larnaca, Cyprus
A.5: Registration Date	2023-03-28
A.6: Legal entity identifier	N/A
A.7: Another identifier required pursuant to applicable national law	Registration number: HE445412 The official register in Cyprus: https://www.companies.gov.cy/gr/
A.8: Contact telephone number	00971525251472
A.9: E-mail address	hello@gicouranian.co
A.10: Response Time (Days)	(1} one working day
A.11: Parent Company	N/A
A.12: Members of the Management body	

Name	Position	Business address
Bettina Polycarpou	Chairwoman of the Management Body	Pavlou Valdaseridi, 2a, Larnaca, Cyprus

A.13: Business Activity	Holoverz, under the strategic leadership of Gicouranian Ltd specializes in the design and e-commerce of limited-edition 3D holographic collectibles. Leveraging proprietary Hogel-based digital holography, each collectible delivers full-parallax, high-resolution visuals, offering users an immersive and captivating experience. These unique collectibles are marketed and sold through a dedicated digital platform where purchases can be made using the HoloVerz Token. Corporate & Technological Structure: HoloVerz is not a standalone initiative. It is part of a broader ecosystem supported by multiple corporate entities within the HoloX Group. The project benefits from a deeply integrated technological and operational structure: • Gicouranian Ltd (Cyprus): Manages token issuance and digital asset operations, ensuring compliance with digital asset regulations and driving token utility development. • HoloX LLC (UAE): Acts as the production partner, operating the high-tech facility for creating physical holographic items. It allocates 3.25% of its worldwide revenue toward token buyback and burning mechanisms, supporting value appreciation and scarcity of the HoloVerz tokens. • HoloX (Global Group): Encompasses several international entities including R&D (Hungary), European operations (Netherlands), and partnerships with material suppliers (e.g., Covestro). The group, founded on technology pioneered at MIT and enhanced through military-grade developments via Zebra Imaging, provides the advanced holography backbone for the project. Security and Anti-Counterfeiting: Beyond collectibles, HoloVerz's holographic technology serves anti-counterfeiting functions. The non-replicable, tamper-evident holograms provide robust security, enabling quick visual authentication and enhancing brand protection. Strategic Integration with BlockBen: BlockBen SIA serves as the platform owner, providing a compliant and secure ecosystem for token sales, user onboarding (with AML/KYC compliance), and transactional infrastructure. This partnership enables the seamless integration of advanced holography and blockchain-based digital asset management under MiCAR-compliant operations. Through this collaborative model involving innovation, regulatory compliance, and strategic corporate partnerships, HoloVerz is positioned at the forefront of digital collectibles and anti-counterfeit solutions.
A.14: Parent Company Business Activity	N/A
A.15: Newly Established	True
A.16: Financial condition for the past three years	N/A As Gicouranian Limited was recently established, there is no historical financial data available for the past three years.
A.17: Financial condition since registration	Gicouranian Limited is the official offeror of the Holoverz utility token, overseeing the public sale and all related commercial activities. In 2024, the company experienced a temporary reduction in revenue (-18.5%) and cash flow (-79.6%), while successfully maintaining profitability. The modest 6% decrease in net profit reflects effective financial discipline and a resilient operational model. The decline in

	cash flow is primarily attributable to forward-looking investments in branding, licensing, and platform development. No operational losses were recorded in either 2023 or 2024, underscoring a stable financial foundation. *Clarifying Roles: Gicouranian (Offeror) vs. HoloX (Technology Provider)* While Gicouranian Limited is responsible for offering the token to the public, the underlying technology, production, and R&D infrastructure for Holoverz is developed and operated by the HoloX Group, a separate entity. HoloX does not participate in the token offering; rather, it delivers the core technological foundation—high-resolution 3D holography, anti-counterfeiting solutions, and scalable manufacturing capabilities—on which the Holoverz product line is built. This structure ensures clear functional separation: • Gicouranian Ltd manages token offering and regulatory positioning. • HoloX Group provides the technological engine behind the product's utility and innovation. *Strategic and Non-Financial Indicators (HoloX)* To contextualize the offering within a broader ecosystem of stability and growth, the following non-financial indicators from HoloX are noteworthy: 1. Technological Innovation o 1200% resolution improvement by reducing Hogle pixel size from 300 microns to 30 microns. o Proprietary IP in volume holography and secure holographic imaging. 2. Strategic Partnerships o Long-term collaboration with Covestro, co-investing €1.5M+ annually in R&D. o Commercial alliances with FC Barcelona, Crane NXT, and Coburn Japan. 3. Scalable Production Infrastructure o Modular roll-to-roll manufacturing enabling efficient global scale-up. o Environmentally conscious design using recyclable materials and low-energy processes. 4. Governance and Regulatory Readiness o Financial oversight provided by PWC, ensuring best-practice standards. o Technological assets are aligned with MiCA standards, supporting sustainable utility token deployment.

Part B - Information about the issuer, if different from the offeror or person seeking admission to trading	
B.1: Issuer different from offeror or person seeking admission to trading	TRUE
B.2: Name	BlockBen SIA
B.3: Legal form	Limited Liability Company (SIA); ELF Code: ES2D
B.4: Registered address	Lāčplēša iela 37, Riga, LV-1010, Latvia

B.5: Head office	Lāčplēša iela 37, Riga, LV-1010, Latvia
B.6: Registration Date	2025-05-20
B.7: Legal entity identifier	254900BBV7FA7LUG5913
B.8: Another identifier required pursuant to applicable national law	N/A
B.9: Parent Company	N/A
B.10: Members of the Management body	<table><tr><th>Name</th><th>Position/Function</th><th>Business Address</th></tr><tr><td>Viktor Mark Bodnar</td><td>Chairman of the Management Body</td><td>Krišjāņa Valdemāra iela 21-11, Riga, LV-1010 (LV-RIX)</td></tr><tr><td>Attila Krocsek</td><td>Member of the Management Body</td><td>Krišjāņa Valdemāra iela 21-11, Riga, LV-1010 (LV-RIX)</td></tr><tr><td>Luize Berzina</td><td>Member of the Management Body; AML/CFT responsibility</td><td>Krišjāņa Valdemāra iela 21-11, Riga, LV-1010 (LV-RIX)</td></tr></table>
B.11: Business Activity	BlockBen SIA is a Latvia-based entity primarily focused on delivering business-to-business (B2B) digital asset services. Its core activity is to support third-party clients in the issuance, administration, and lifecycle management of their crypto-assets within a secure, compliant infrastructure aligned with Regulation (EU) 2023/1114 (MiCAR). BlockBen operates a proprietary digital wallet and hybrid blockchain infrastructure (Qantrum), designed to host, manage, and facilitate internal transfers of both third-party tokens and BlockBen's own crypto-assets, such as utility and asset-linked tokens issued on the platform. The BlockBen Wallet functions as a closed, permissioned environment. It is not interoperable with public or open blockchains and does not support external token custody. This architecture ensures enhanced regulatory compliance, robust transaction control, and strict adherence to AML/CFT obligations. In addition, BlockBen SIA facilitates fiat-to-crypto conversion services, enabled through partnerships with licensed EU financial institutions. All platform services are provided under comprehensive legal and compliance oversight, ensuring conformity with applicable financial and data protection frameworks.
B.12: Parent Company Business Activity	N/A

Part C - Information about the operator of the trading platform in cases where it draws up the crypto-asset white paper and information about other persons drawing the crypto-asset white paper pursuant to Article 6(1), second subparagraph, of Regulation (EU) 2023/1114
N/A

Part D - Information about the crypto-asset project	
D.1: Crypto-asset project name	Holoverz
D.2: Crypto-assets name	Holoverz
D.3: Abbreviation	3DHT
D.4: Crypto-asset project description	Holoverz is a crypto-asset issued on the BlockBen platform, designed to provide access to exclusive digital and physical collectibles—most notably, limited-edition 3D holographic cards.
D.5: Details of all natural or legal persons involved in the implementation of the crypto-asset project	Blockben Financial Services OÜ is responsible for the implementation of the crypto-asset project. The business

	address is Harju tn. 6., 10130 Tallinn, Estonia. BlockBen Financial Services OÜ is a former issuer of the tokens, the status of the issuer was assigned to BlockBen UAB (Lvivo g. 25-702, LT-09320 Vilnius, Lithuania), and then to BlockBen SIA. Thus, BlockBen SIA is currently the issuer of Holoverz as of the date of this whitepaper. Gicouranian Limited is the official offeror of the Holoverz utility token. It is responsible for the public offering, sales, and related commercial activities, including marketing, partnership management, and community development within the Holoverz ecosystem. HoloX (including HoloX LLC and other entities within the HoloX Group) serves as the technology partner. It is responsible for the design, production, and ongoing innovation of the 3D holographic collectible products, and provides the underlying technological infrastructure (including anti-counterfeit holography) that forms the functional basis of the utility token.
D.6: Utility Token Classification	TRUE
D.7: Key Features of Goods/Services for Utility Token Projects	Holoverz grants holders access to a curated line of exclusive digital and physical collectible products, including: • 3D holographic collector cards, available in limited series; • Access to platform-exclusive product releases and promotions via the BlockBen wallet; • Use within a closed, permissioned ecosystem, ensuring controlled and compliant interactions. These goods and services are available solely within the BlockBen platform and cannot be used as a general-purpose payment instrument.
D.8: Plans for the token	Past Milestones • Design and creation of the Holoverz Utility Token within the BlockBen ecosystem • Launch and completion of the historic public pre-sale phase via the BlockBen Wallet ecosystemInitial release of limited-series 3D holographic collectible products • Activation of internal token transfer functionality between verified users within the BlockBen Wallet ecosystem • Deployment of the token within a permissioned, secure blockchain infrastructure • Secured a licensing agreement with FC Barcelona, affirming market readiness and global brand alignment • Partnered with Crane NXT, establishing HoloX technology as the core of a high-security solution suite for the next 20 years • Initiated discussions with Sinigaglia, a major global card distributor, unlocking access to high-volume distribution networks exceeding 2 billion units annually Future Milestones • Expansion of the collectible product offering, including additional limited series • Technical improvements to the user interface and redemption process • Implementation of token burn mechanisms to manage supply

	• Continued updates to ensure MiCAR compliance, operational scalability, and platform stability • Deepened integration of HoloX holography in both high-security and consumer product verticals • Exploration of licensing opportunities with additional global brands and content IPs • Listing the token on exchanges
D.9: Resource Allocation	Financial Resources BlockBen allocates dedicated financial resources to support the development, issuance, and management of the 3DHT token. This includes funding for product development (3D holographic collectibles), platform integration within the BlockBen Wallet, and MiCAR-related legal and regulatory compliance. Human Resources A specialized team manages the project, including product managers, compliance officers, legal advisors, and operations staff responsible for user support and token lifecycle oversight. Technological Resources 3DHT operates on BlockBen's secure, closed blockchain infrastructure. Resources are allocated to ensure platform reliability, user access, and secure token operations, aligned with MiCA and DORA principles. Operational Resilience BlockBen maintains business continuity measures and cybersecurity safeguards to support uninterrupted access to 3DHT-related services and the timely delivery of associated physical products. Product Innovation & R&D Ongoing efforts are focused on developing new series of collectibles and improving the user experience within the Holoverz ecosystem. Third-Party Services BlockBen collaborates with vetted partners for collectible production, logistics, and regulatory advisory to ensure compliant and efficient operations. Marketing BlockBen dedicates targeted marketing resources to support brand awareness and user acquisition for the Holoverz platform and the 3DHT token. These efforts include cross-channel promotional campaigns such as digital advertising, and community engagement initiatives. In addition, BlockBen develops educational content and organizes events to communicate the token's utility, security features, and the collectible value of its products. All marketing activities are adapted to regional requirements to ensure full compliance with local advertising regulations and MiCAR disclosure obligations.
D.10: Planned Use of Collected Funds or Crypto- Assets	Funds raised through the offer will be used by the Offeror to: • Produce and distribute the collectible holographic products; • Technology development for mass production

	• Develop new collectible series and enhance product design; • Support marketing and community engagement activities to grow the Holoverz user base. The Issuer will allocate funds toward: • Maintaining and developing the digital infrastructure for token operations, including the underlying blockchain and wallet integration; • Ensuring regulatory compliance, including monitoring, transaction oversight, and whitepaper updates; • Supporting user onboarding and secure custody of tokens, aligned with applicable financial and AML/CFT regulations. This offer is not intended to raise capital for unrelated financial investments but to directly support the utility-based operations of the Holoverz ecosystem. While BlockBen SIA is the MiCA-compliant issuer of the Holoverz utility token, the Offeror, Gicouranian Ltd, is contractually appointed by the Issuer to perform defined commercial functions in the Holoverz project, including marketing, distribution, and operational execution of utility-related services. The Offeror does not act independently to place crypto-assets on a professional basis. Instead, it operates under the oversight and authorization of the Issuer, in accordance with a Business Cooperation Agreement (or equivalent governance document), which: • Authorizes Gicouranian Ltd to perform utility execution roles linked to the token's real-world product functionality; • Defines the revenue-sharing or fund-allocation mechanics, ensuring that any proceeds received or handled by the Offeror are part of a pre-agreed operational budget; • Preserves regulatory accountability within the Issuer, which remains responsible for compliance with MiCAR obligations, whitepaper updates, transaction monitoring, and end-user protection. Therefore, Gicouranian Ltd's involvement does not constitute unauthorized placement of crypto-assets. Rather, it is acting as an operational partner, engaged in deploying funds to fulfill the utility function of the token (e.g., product production, delivery, customer support), under a framework defined and governed by the regulated Issuer.

Part E - Information about the offer to the public of crypto-assets or their admission to trading	
E.1: Public Offering or Admission to trading	OTPC – offer to the public
E.2: Reasons for Public Offer or Admission to trading	The public offer of the Holoverz (3DHT) Utility Token aims to support the launch and expansion of a unique ecosystem of high-quality 3D holographic collectible products. The offer enables users to access and redeem limited-edition items via the BlockBen platform. To complement this, the Offeror may also pursue Admission

	to Trading (ATTR) for the Holoverz token on regulated exchange platforms after the pre-sale phase. This step is being considered to: • Enhance token liquidity and accessibility beyond the platform; • Promote broader adoption and price transparency through fair market discovery; • Enable secondary market utility and usability of the token; • Support the token's evolving value proposition as the ecosystem matures; •
E.3: Fundraising Target	N/A
E.4: Minimum Subscription Goals	N/A
E.5: Maximum Subscription Goal	8,38 million
E.6: Oversubscription Acceptance	False The total number of Holoverz (3DHT) Utility Tokens is strictly limited to 8.38 million, all of which have already been issued. This means that it is technically and operationally impossible to allocate more tokens than this fixed supply. If subscription applications were to exceed the quantity of tokens that remain available for distribution (i.e., those not yet sold or reserved), such excess applications would be: • Rejected automatically, as there are no further tokens to allocate; • Any funds received beyond the available supply would be refunded in full to the applicants, using the original payment method, and subject to standard AML/CFT verification procedures; • No additional tokens will be created or released to meet excess demand.
E.7: Oversubscription Allocation	No additional tokens can be created, and oversubscription is not technically possible beyond the available token inventory.
E.8: Issue Price	6,99 EUR
E.9: Official currency or any other crypto- assets determining the issue price	EUR
E.10: Subscription fee	N/A
E.11: Offer Price Determination Method	The offer price of the Holoverz (3DHT) Utility Token was determined using a fixed initial pricing model with a programmed daily increment, based on a transparent and predictable formula. • The initial issue price was set at 6.99 EUR per token during the first 30 days of the public offer that launched in June 2023. • After this period, the price increased daily by 0.11%, this price escalation had been established to make sure that those buyers who decided to join the community at an earlier phase may benefit from a lower intial token price. • This progressive pricing structure reflected the increasing scarcity and value utility of the token as the project and product ecosystem evolve. It is important to note that this initial issue price was applied in 2023, at the time when the token was originally issued by BlockBen Financial Services OÜ. Subsequent offerings or listing activities are conducted within the evolving regulatory

	and operational structure, including future alignment under the Latvian CASP license and MiCA-compliant framework.
E.12: Total Number of Offered/Traded Crypto- Assets	8,38 million 3DHT
E.13: Targeted Holders	RETI
E.14: Holder restrictions	1. Age and Legal Eligibility • Holders must be at least 18 years old. • They must not be classified as a "Restricted Person", meaning individuals on international sanctions lists or those acting on behalf of such persons. 2. KYC and AML Requirements • All 3DHT holders are subject to full KYC. This includes providing identification documents and undergoing screening against international sanctions lists. • Without successful KYC, no transaction is permitted within the Blockben Wallet. 3. Geographic and Regulatory Restrictions • All jurisdictions are eligible, except those categorized as prohibited or high-risk countries by BlockBen's AML framework. • This list aligns with EU-level sanctions and FATF advisories and is regularly updated by the MLRO and compliance function. • The whitepaper emphasizes that use or ownership must comply with local laws, and Blockben assumes no liability for violations of foreign regulatory environments. 4. Use Restrictions • Holders must not use the tokens for any illegal activities, such as: o Money laundering o Terrorist financing o Illegal gambling o Blackmail, fraud, extortion, or ransom-related activities.
E.15: Reimbursement Notice	Purchasers participating in the offer to the public of crypto-asset will be able to be reimbursed if they exercise the right to withdrawal provided for in Article 13 of Regulation (EU) 2023/1114 of the European Parliament and of the Council or if the offer is cancelled.
E.16: Refund Mechanism	If a purchaser exercises the right of withdrawal within 14 calendar days from the date of purchase, or if a refund is otherwise warranted, BlockBen SIA will initiate a secure refund process as follows: • Reimbursement Method: Refunds will be made using the same payment method used for the original purchase, unless otherwise agreed in writing with the purchaser. • Refund Currency: Refunds will be issued in EUR, regardless of whether the original payment was made in fiat or crypto (converted at the transaction rate at time of purchase, if applicable). • Refund Timeline: The refund will be processed within 14 calendar days from the date BlockBen is notified of the withdrawal or refund request. • Processing and Communication: o Purchasers will receive a Reimbursement

	Notice confirming the amount, method, and date of refund. o No refund fees or administrative deductions will be applied by BlockBen SIA. • Exceptions: Refunds may be denied or delayed if: o The request is submitted after the legal withdrawal period, o The user account is under review for AML/CFT concerns, o Required identity verification is incomplete or disputed.
E.17: Refund Timeline	If a valid withdrawal or refund request is received, BlockBen SIA will process the refund within 14 calendar days from the date the request is received and confirmed.
E.18: Offer Phases	• Pre-Sale (currently ongoing) • Sale and redemption on trading platforms
E.19: Early Purchase Discount	An early purchase discount was applied during the initial launch phase of the Holoverz (3DHT) Utility Token offer: • The initial offer price was set at 6.99 EUR per token. • This discounted rate was available for a period of 30 calendar days from the start of the public offer on 28 June 2023. • After this period, the token price increased daily by 0.11%, based on a programmed pricing mechanism.
E.20: Time-limited offer	TRUE
E.21: Subscription period beginning	8 January 2025 (current offer start date; historic offer subscription date was 28 June 2023)
E.22: Subscription period end	The historic public pre-sale subscription period of the 3DHT token concluded on 01.04.2026. As of the date of this white paper, the 3DHT token is no longer available for direct purchase from the issuer or through the BlockBen platform. Admission to trading, external transferability, and/or availability on third-party trading venues may be evaluated and implemented at a later stage, subject to applicable legal, regulatory, technical, operational, and compliance assessments.
E.23: Safeguarding Arrangements for Offered Funds/Crypto-Assets	During the time-limited public offer of the Holoverz (3DHT) Utility Token, BlockBen ensured that all funds received from purchasers were securely held in segregated accounts with EU-based financial institutions. These accounts were separated from BlockBen's own operational funds and were used exclusively for processing token purchases and potential withdrawals during the offer period. In addition internal controls and transaction logs were maintained to ensure traceability and fund integrity. The safeguarding process complies with the principles of customer fund protection outlined in MiCA Article 10. As of the date of this white paper update, the public pre-sale phase has concluded and the 3DHT token is no longer available for direct purchase from the issuer or through the BlockBen platform.
E.24: Payment Methods for Crypto-Asset Purchase	During the historic public pre-sale phase of the Holoverz (3DHT) Utility Token, purchasers were able to acquire 3DHT tokens exclusively in exchange for EURC within the BlockBen Wallet ecosystem. As of the date of this white paper update, the public pre-sale phase has concluded and 3DHT tokens are no longer available for direct purchase from the issuer or through the BlockBen platform.

E.25: Value Transfer Methods for Reimbursement	BlockBen processes the reimbursement to the retail holder using the same payment method originally used for the purchase of the Holoverz (3DHT) Utility Token, wherever possible. If the original payment method is not available or technically feasible, an alternative method may be used, subject to the agreement of the retail holder. In all cases: • Reimbursement will be made in fiat currency (EUR) or in equivalent value, depending on the original form of payment; • No fees or deductions will be applied by BlockBen for the reimbursement; • The full amount received will be refunded within 14 calendar days from the date the withdrawal request is received.
E.26: Right of Withdrawal	In accordance with Article 13 of Regulation (EU) 2023/1114 (MiCA), purchasers who qualify as retail holders are granted a 14-day right of withdrawal from the date of purchase of the Holoverz (3DHT) Utility Token. During this period, a retail holder may withdraw from the agreement without providing any reason. The withdrawal period begins on the date the purchase transaction is concluded. To exercise this right, the retail holder must notify BlockBen in a clear and unambiguous manner (via email to support@blockben.com) within the 14-day period. Upon receipt of a valid withdrawal request, BlockBen shall reimburse all payments received from the retail holder, including any applicable charges, without undue delay and no later than 14 calendar days from the date of notification. This right applies only to natural persons acting outside their trade, business, or profession. It does not apply to professional clients or institutional purchasers.
E.27: Transfer of Purchased Crypto-Assets	Upon successful completion of a purchase, Holoverz (3DHT) tokens were credited to the purchaser's wallet within the BlockBen platform. Tokens were allocated in a permissioned environment, and access is restricted to wallets registered and verified under BlockBen's compliance framework. Token holders are able to view and manage their 3DHT tokens within the BlockBen Wallet interface. As of the date of this white paper update, 3DHT tokens may be transferred exclusively between verified users within the BlockBen Wallet ecosystem. Transfers outside the platform (e.g., to third parties or exchanges) may be enabled at a later stage, in line with the project roadmap and regulatory considerations.
E.28: Transfer Time Schedule	Upon completion of a purchase, the Holoverz (3DHT) Utility Tokens were immediately credited and visible in the purchaser's BlockBen Wallet account. This ensures users have instant access to their tokens within the platform environment. As of the date of this white paper update, transfers between verified BlockBen Wallet users are processed immediately within the BlockBen platform infrastructure, subject to applicable compliance controls, transaction monitoring procedures, technical maintenance periods, and operational safeguards.
E.29: Purchaser's Technical Requirements	Purchasers of Holoverz (3DHT) tokens are not required to install or manage any third-party wallet software. The

	tokens are held and managed exclusively within the BlockBen Wallet, a proprietary, closed-system digital wallet integrated into the BlockBen platform. To access and hold 3DHT tokens, purchasers must: • Create and verify a BlockBen user account, including completion of required KYC/AML checks; • Use a compatible web browser or mobile device with internet access to log in to their BlockBen Wallet; • Maintain secure login credentials (e.g., email, password, and any applicable two-factor authentication tools).
E.30: Crypto-asset service provider (CASP) name	N/A
E.31: CASP identifier	N/A
E.32: Placement form	NTAV
E.33: Trading Platforms name	N/A
E.34: Trading Platforms Market Identifier Code (MIC)	N/A
E.35: Trading Platforms Access	N/A
E.36: Involved costs	Users may be subject to exchange-defined trading or withdrawal fees, which are independent of BlockBen.
E.37: Offer Expenses	Legal and Regulatory Advisory:Approx. EUR 25,000 Covers MiCA compliance consultation, and preparation of licensing documents. Marketing and Promotion: Approx. EUR 3,000 Includes public communications, content creation, and promotional activities on the BlockBen platform. Platform Development:Approx. EUR 10,000 For technical implementation and integration of 3DHT tokens within the BlockBen Wallet interface. Operational and Administrative:Approx. EUR 4,000 Supports internal operations, including customer support, administrative coordination, and KYC handling. Payment Processing and Transaction Fees:Approx. EUR 800 Related to fiat and crypto payment handling during the offer phase.
E.38: Conflicts of Interest	As of the date of this whitepaper, no conflicts of interest have been identified between BlockBen SIA, its management, affiliated entities, or any other parties involved in the issuance and public offering of the Holoverz (3DHT) Utility Token. All decisions relating to the design, issuance, marketing, and management of the 3DHT token have been made independently and in the best interest of future token holders. BlockBen maintains internal policies to identify and manage potential conflicts of interest in accordance with applicable regulatory requirements.
E.39: Applicable law	Holoverz (3DHT) Utility Token is governed by the laws of the Republic of Latvia, specifically in accordance with Regulation (EU) 2023/1114 on Markets in Crypto-Assets (MiCA)
E.40: Competent court	Courts of Republic of Latvia

Part F - Information about the crypto-assets	
F.1: Crypto-Asset Type	Utility token
F.2: Crypto-Asset Functionality	The Holoverz (3DHT) Utility Token is designed to provide holders with access to a curated range of digital and physical

	collectible products, specifically: • Access to exclusive 3D holographic collector cards, issued in limited series via the BlockBen platform; • Participation in platform-based product launches and special releases; • Interaction within a closed, permissioned ecosystem, where the token serves as a utility instrument tied to specific products or services; 3DHT does not grant ownership rights, profit-sharing, or governance power.
F.3: Planned Application of Functionalities	In the next development phases of the Holoverz project, the following functionalities are planned for the 3DHT token: • Implement a marketplace function within the Holoverz ecosystem to allow users to list, buy, and trade 3DHT tokens and associated holographic collectibles. • Support token redemption for exclusive physical products linked to specific 3DHT holdings.
A description of the characteristics of the crypto-asset, including the data necessary for classification of the crypto-asset white paper in the register referred to in Article 109 of Regulation (EU) 2023/1114, as specified in accordance with paragraph 8 of that Article	
F.4: Type of white paper	OTHR
F.5: The type of submission	NEW
F.6: Crypto-Asset Characteristics	Key characteristics include: • Token Type: Utility token (non-transferable during pre-sale phase) • Blockchain Infrastructure: Issued and held within a closed, permissioned blockchain managed by BlockBen • Token Supply: Maximum cap of 8.38 million tokens (with burning mechanisms applied post-sale) • Form: Digital token represented and managed within the BlockBen Wallet • Transferability:; transfer functionality enabled • No underlying asset or profit rights: 3DHT does not represent ownership, entitlement to income, or voting rights
F.7: Commercial name or trading name	BlockBen SIA
F.8: Website of the issuer	www.blockben.com
F.9: Starting date of offer to the public or admission to trading	2026-01-10
F.10: Publication date	2026-07-20
F.11: Any other services provided by the issuer	N/A
F.12: Identifier of operator of the trading platform	N/A
F.13: Language or languages of the white paper	EN
F.14: Digital Token Identifier Code used to uniquely identify the crypto-asset or each of the several crypto assets to which the white paper relates, where available	GM8G2QJDZ
F.15: Functionally Fungible Group Digital Token Identifier, where available	8PCKDKQQN
F.16: Voluntary data flag	False
F.17: Personal data flag	False
F.18: LEI eligibility	True
F.19: Home Member State	Latvia
F.20: Host Member States	BlockBen SIA intends to offer the Holoverz (3DHT) Utility Token to clients in the following jurisdictions beyond its Home Member State (Latvia): European Union (EU) Member States: • Austria

	• Belgium • Bulgaria • Croatia • Cyprus • Czech Republic • Denmark • Estonia • Finland • France • Germany • Greece • Hungary • Ireland • Italy • Lithuania • Luxembourg • Malta • Netherlands • Poland • Portugal • Romania • Slovakia • Slovenia • Spain • Sweden European Economic Area (EEA) States: • Iceland • Norway • Liechtenstein

Part G - Information on the rights and obligations attached to the crypto- assets	
G.1: Purchaser Rights and Obligations	Rights of the Purchaser: • Right of Withdrawal: Retail purchasers have the right to withdraw from the purchase agreement within 14 calendar days of the purchase date, in accordance with Article 13 of Regulation (EU) 2023/1114. Upon valid withdrawal, the purchaser is entitled to a full refund without charges. • Access to Functionalities: Upon purchase, 3DHT tokens are credited to the purchaser's BlockBen Wallet and provide immediate access to platform-exclusive product offerings and digital features. • Transparency and Information: Purchasers have the right to access this whitepaper and other relevant information related to the crypto-asset offering, including token utility, terms, risks, and ongoing updates. • Data Protection: Personal data of purchasers is handled in accordance with Regulation (EU) 2016/679 (GDPR), and purchasers have rights to access, correct, or request deletion of their personal data. Obligations of the Purchaser: • Wallet Access and Security: Purchasers must securely maintain access credentials to their BlockBen Wallet and are responsible for any unauthorized access due to negligence or credential sharing.

	• KYC/AML Compliance: Purchasers are required to complete identity verification (KYC) and comply with anti-money laundering (AML) requirements before completing the purchase. • Use Within Ecosystem: 3DHT is intended solely for use within the BlockBen platform currently. Purchasers agree not to use the token for prohibited or unlawful purposes.
G.2: Exercise of Rights and obligations	Right of Withdrawal (Article 13 MiCA): • Purchasers who qualify as retail holders may withdraw from the purchase agreement within 14 calendar days from the date of purchase. • To exercise this right, the purchaser must submit a clear and written request to: Email:support@blockben.com • Subject line: "Withdrawal Request – 3DHT Token Purchase" • Upon receiving a valid request, BlockBen will refund the full amount paid within 14 calendar days, using the same payment method, unless otherwise agreed. Right to Access Information: • The current whitepaper and any updates will be made available free of charge on the official website • Any material changes to token functionality, transferability, or regulatory status will be communicated via email and published on the platform. Right to Data Protection (GDPR): • Purchasers may exercise rights related to their personal data (access, correction, deletion) by submitting a request to: Email: dataprotection@blockben.com Right to Submit Complaints: • Users may file complaints related to token access, wallet functionality, or exercise of rights via: Email: support@blockben.com A response will be provided within 15 business days, in line with internal complaint handling procedures.
G.3: Conditions for modifications of rights and obligations	BlockBen SIA reserves the right to modify the rights and obligations associated with the Holoverz (3DHT) Utility Token under the following conditions: • Regulatory Changes: Adjustments may be made if required by updates to applicable legislation or supervisory guidance under Regulation (EU) 2023/1114 (MiCA), GDPR, or Latvian national law. • Platform or Token Functionality Updates: Changes related to token transferability, redemption methods, or platform usage terms may be introduced as part of product evolution or technical upgrades, provided such changes do not materially reduce the rights of existing purchasers. • Notification Requirement: Any material modification will be: o Published on the BlockBen website o Communicated directly to token holders via email or the BlockBen Wallet interface; • Right to Withdraw in Case of Adverse Changes: If a modification materially affects the rights of retail purchasers, they may exercise the right to withdraw

	from the purchase agreement, provided the withdrawal is submitted within 14 calendar days from the notification of the change.
G.4: Future Public Offers	BlockBen SIA may engage in future public offers of additional crypto-assets that serve distinct utility functions within the BlockBen ecosystem. These may include: • Expanded Holoverz token series to support new collectible product lines or limited edition releases; • Platform-specific utility tokens related to other digital services or experiences, subject to separate whitepaper disclosures and compliance with Regulation (EU) 2023/1114;
G.5: Issuer Retained Crypto-Assets	N/A Should any tokens remain unallocated after the offering concludes, and are not designated for future functional use, they may be: • Burned using an irreversible smart contract mechanism; or • Permanently withdrawn from circulation, ensuring that they cannot re-enter the market.
G.6: Utility Token Classification	TRUE
G.7: Key Features of Goods/Services of Utility Tokens	Quality: • Each collectible card features unique holographic effects, high-resolution 3D visuals, and serialized limited-series identifiers. • Cards are designed for collectors and fans, ensuring premium aesthetic and production value. Quantity: • Each Holoverz (3DHT) token allows the holder to redeem one or more collectibles, depending on the current offering and promotional campaigns. • Specific redemption values (e.g., 1 card per token, bundles, etc.) are published transparently within the BlockBen Wallet at the time of purchase or use. The number of products accessible per token may vary depending on the product series, availability, and platform engagement mechanics (e.g., limited series releases, loyalty programs).
G.8: Utility Tokens Redemption	Redemption Mechanics: • Token holders access the Holoverz redemption interface via the BlockBen Wallet. • Available collectible cards are listed within the platform, each associated with a fixed redemption value in 3DHT tokens. • Users select the desired card(s) and redeem tokens directly for those items. • Upon redemption, the chosen cards are physically manufactured and delivered to the user, or distributed via secure fulfillment channels. Redemption is final and one-directional—redeemed tokens are considered spent and are not re-issuable or resalable.
G.9: Non-Trading request	TRUE
G.10: Crypto-Assets purchase or sale modalities	N/A
G.11: Crypto-Assets Transfer Restrictions	During the historic public pre-sale phase of the Holoverz (3DHT) Utility Token was non-transferable. Tokens were credited to purchasers' BlockBen Wallet accounts upon purchase but couldn't be transferred, traded, or withdrawn

	during this period. Transferability is enabled: • Tokens can be transferred within the BlockBen ecosystem • Transfers are subject to KYC/AML controls and platform-specific compliance rules, • No external blockchain wallet support is available
G.12: Supply Adjustment Protocol	TRUE
G.13: Supply Adjustment Mechanisms	The total supply of Holoverz (3DHT) Utility Tokens is capped at 8,880,000 tokens. No additional tokens will be minted beyond this maximum supply. However, supply reduction mechanisms may apply, including: • Token Burning: 3DHT tokens used in product redemptions may be burned (permanently removed from circulation), depending on the structure of each promotional campaign. • Locked Reserves: A portion of the total supply may be time-locked or held in reserve for specific future use cases, which may limit circulating supply without changing the total cap. • No Minting Mechanism: The smart contract and issuance logic do not include functionality for future minting or supply expansion.
G.14: Token Value Protection Schemes	FALSE
G.15: Token Value Protection Schemes Description	N/A
G.16: Compensation Schemes	FALSE
G.17: Compensation Schemes Description	N/A
G.18: Applicable law	Holoverz (3DHT) Utility Token is governed by the laws of the Republic of Latvia, specifically in accordance with Regulation (EU) 2023/1114 on Markets in Crypto-Assets (MiCA)
G.19: Competent court	Courts of Republic of Latvia

Part H - information on the underlying technology	
H.1: Distributed ledger technology	Qantrum is a hybrid, consortium-style distributed ledger (“not open, not closed”) specifically designed for regulated environments. It encrypts data on the blockchain but retains certain centralized controls (e.g., freezing of accounts) to meet supervisory requirements. Each financial institution deploys its own blockchain, ensuring data never leaves the institution; only zero-knowledge proofs (ZK proofs) may be shared with other institutions over the Qantrum network or external blockchains.
H.2: Protocols and technical standards	Qantrum uses a microservice architecture and the following main cryptographic standards: • Elliptic curves: BLS12-381 (for distributed key generation) and secp256k1 • Encryption & hashing: ECIES, AES, HMAC, SHA, bcrypt, scrypt • Consensus: proof of identity and zero knowledge proof based proofs • Programming: TypeScript-based SDK for smart-contract-like functionality • R&Đ: Under development to replace cryptographic primitives in our existing protocols with post quantum safe solutions using ML-KEM and ML-DSA
H.3: Technology Used	The Qantrum platform is a hybrid, blockchain-based system designed specifically for the secure handling, storage, and

	transfer of digital assets (including crypto-assets) in regulated environments. Key aspects include: Client-Side Key Generation and Distributed Key Storage • User devices generate private keys that never leave the device; thus, transactions require explicit authorization from the user. • System (central) keys are cryptographically linked to user keys, allowing the service provider to freeze or suspend accounts if required by regulators (but not to conduct transactions unilaterally). • Shared key generation (e.g., BLS12-381–based NPVDKG-RS) enables M-of-N multi-signature schemes (e.g., multi-owner accounts). Data Storage and Encryption • Data on the blockchain is encrypted by default (e.g., via ECIES, AES, HMAC, SHA), preventing unauthorized access to stored information. • The platform manages cryptographic keys using a segmented approach (key fragments), reinforcing data security. • A World State Machine (WSM) cache holds the most recent data values, so users can access up-to-date information without traversing the entire blockchain. Smart-Contract-Like Features (Smart Contract Runtime) • Qantrum provides a TypeScript-based execution environment that runs business logic via microservices. • Developers define custom "smart" functionality, which is stored on the blockchain and executed in a sandbox environment within the platform. • The platform's extended consensus algorithm validates each of these functionalities before they are committed. Secure, Reliable Transaction Handling • Transactions rely on a two-phase commit approach combined with an extended RAFT-style consensus, preventing data corruption and ensuring that asset transfers occur in a controlled, lawful way. • Each transaction carries a digital signature and zero-knowledge proof that are stored on-chain, making post-hoc tampering virtually impossible. Compliance with Regulatory and Audit Requirements • The platform supports dedicated Audit Ledgers or Authority Nodes, which allow auditors or regulators to verify data in encrypted form while confirming its authenticity. • Where regulations mandate suspension or restriction of accounts (e.g., a court order or supervisory request), the Qantrum architecture allows for temporary or forever freezes without exposing private keys. By integrating these cryptographic and architectural features, Qantrum provides robust security and flexibility for issuing, storing, and transferring crypto-assets, while supporting the central control functions and oversight requirements that regulated financial and payment environments demand.
H.4: Consensus Mechanism	The consensus mechanism is primarily based on proof of identity and zero-knowledge proofs (ZK proofs), ensuring that verified proof data is replicated across the ledger nodes. This configuration enables two-phase commit and anti-monopolize measures, preventing any single node from seizing control.

	Furthermore, distributed key generation and distributed signing establish a dependency between users and the system, ensuring that neither side can produce a valid message or transaction without the other's explicit involvement.
H.5: Incentive Mechanisms and Applicable Fees	There is no network fee, we have processing fee and transaction fee. The processing fee goes to a gold pool, which is an incentive pool for the Blockben ecosystem.
H.6: Use of Distributed Ledger Technology	TRUE
H.7: DLT Functionality Description	Qantrum's DLT is structured into clusters, with each cluster serving as its own permissioned ledger within a larger network. Data is kept in an immutable blockchain layer and also stored in a World State Machine (WSM) cache for rapid reads. All data is encrypted by default, and only authorized parties hold the corresponding decryption keys. The platform uses microservices (Executors and Ledger nodes) for transaction processing and block creation. No direct data transfer occurs across clusters. Instead, zero-knowledge proofs are exchanged. Each cluster effectively represents a separate financial institution. Qantrum lightpaper: https://data.Qantrum.io/docs/Qantrum_Lightpaper.pdf https://github.com/Qantrumofficial/npvdkgrs/blob/master/math/NPVDKGRS.pdf
H.8: Audit	The cryptographic parts have been checked by external mathematicians, by the Cryptography Department of Eötvös Lóránd Tudományegyetem (Hungary).
H.9: Audit outcome	During the audit, the mathematicians found no errors, they found an acceleration potential in the algorithm, which means that the cost of distributed generation of the consensus and digital keys is about 20% lower.
Part I - Information on the risks	
I.1: Offer-Related Risks	1. Regulatory and Legal Risk • The crypto-asset regulatory landscape continues to evolve. Changes in applicable EU or national regulations may impact the token's use, transferability, or the operation of the BlockBen platform. • Certain jurisdictions may restrict or prohibit access to crypto-asset products. 2. Market and Value Risk • The value of the 3DHT token is not guaranteed and may fluctuate based on demand, platform engagement, or broader market sentiment. • There is no token value protection mechanism in place. 3. Liquidity and Transferability Risk • As of the date of this white paper update, 3DHT tokens are transferable exclusively within the closed BlockBen Wallet ecosystem between verified users. • External transfers, trading on third-party trading venues, and public market liquidity are currently not enabled. • Any future transferability expansion, interoperability, or trading functionality may be limited, delayed, restricted, or subject to regulatory and operational conditions. Holders may experience limitations in transferring, exchanging, or utilizing 3DHT tokens outside the BlockBen ecosystem.4. Technological and Cybersecurity Risk • Any vulnerabilities in the BlockBen Wallet, underlying blockchain infrastructure, or user access controls may lead to token loss, theft, or

	inaccessibility. • BlockBen implements robust security measures, but no system is immune to cyber threats. 5. Operational Risk • Delays or issues in the delivery of redeemable products (e.g., holographic collectibles) due to supply chain, technical, or logistical disruptions could impact the utility of the token. 6. Platform Dependency Risk • 3DHT tokens are functional exclusively within the BlockBen ecosystem. If the platform were to become unavailable, token utility could be affected. 7. No Financial Return • 3DHT tokens do not represent ownership, profit-sharing, or claims to financial returns. They are not intended as investment products. 8. Right of Withdrawal Limitations • The right of withdrawal is available only to retail purchasers for a limited 14-day period after purchase, as per Article 12 of MiCA.
I.2: Issuer-Related Risks	1. Financial Situation Risk • BlockBen SIA is a newly incorporated entity in Latvia and does not yet have a full financial history. While supported by the broader BlockBen group, its financial performance is still in early stages. • Operational funding is primarily shareholder-driven, and the company may rely on future revenues or capital injections to sustain development and regulatory compliance. 2. Business Activity and Sector Risk • BlockBen operates in the highly dynamic and competitive digital asset and tokenization industry. • Regulatory scrutiny, market volatility, or a shift in consumer interest toward competing platforms or products could impact its business model. • The collectible sector, particularly combining physical and digital goods, is still emerging and carries uncertainties in demand and logistics. 3. Legal and Regulatory Risk • While BlockBen SIA is actively pursuing MiCA registration in Latvia, changes in legal interpretation or future regulatory developments could affect token offerings, wallet operations, or product availability. • Cross-border activities and planned passporting across the EU increase exposure to multi-jurisdictional compliance risk. 4. Internal Control and Governance Risk • As BlockBen SIA is under establishment, some key roles (e.g., AML Officer, Compliance Officer) are still being finalized or outsourced, which may pose temporary governance gaps. • The company is scaling its internal controls and audit functions, but any deficiencies could result in compliance delays or operational inefficiencies. 5. Dependency on Key Individuals • BlockBen relies on a small group of founding shareholders and management. The departure or unavailability of key individuals could impact the execution of its strategy or regulatory obligations.

	6. Technological and Outsourcing Risk • Some IT and auditing functions are outsourced to third parties. While this allows for operational flexibility, it introduces third-party risk, including service continuity and data protection concerns.
I.3: Crypto-Assets-related Risks	1. Utility Risk • 3DHT does not represent ownership, investment, or income-generating rights. • Its value is derived solely from its utility — i.e., access to Holoverz collectibles and platform features. If demand for these services declines, token utility and perceived value may also decrease. 2. Market Value Volatility • Although 3DHT is not intended for speculative purposes, once transferability and trading are enabled, its value may fluctuate based on user demand, market sentiment, or secondary market activity. 3. Transferability Limitations • As of the date of this white paper update, 3DHT tokens are transferable exclusively within the closed BlockBen Wallet ecosystem between verified users. Holders may experience limitations in transferring, exchanging, or utilizing 3DHT tokens outside the BlockBen ecosystem. 4. Redemption Risk • Token holders may face limitations in redeeming 3DHT for collectibles due to limited stock, geographic restrictions, or platform availability. 5. Platform Dependency • The token can only be used within the BlockBen ecosystem. If the platform becomes unavailable or is suspended, token usability would be directly affected. 6. Cyber and Fraud Risk • While the token operates within a permissioned system, cyberattacks or unauthorized access to user wallets could result in the loss or misuse of tokens. 7. Loss of Access • Loss of credentials or failure to complete required identity verification may result in the permanent loss of access to tokens. 8. Smart Contract Risk • Although 3DHT is not deployed on an open blockchain, any future changes involving smart contracts (e.g., enabling transferability or burning mechanisms) may introduce technical vulnerabilities.
I.4: Project Implementation-Related Risks	1. Development Delays • Technical development of new collectible features, token utilities, and user interface upgrades may take longer than expected, delaying access to certain functionalities or product drops. 2. Supply Chain and Fulfillment Risk • Holoverz includes physical 3D collectible items. Disruptions in manufacturing, printing, packaging, or shipping processes may delay the delivery of products to token holders or limit availability. 3. Resource Allocation Constraints • As BlockBen SIA is in the process of establishment,

	any shortfall in human or financial resources could affect execution timelines for the platform's product development and operational scaling. 4. Scalability Challenges • If user adoption exceeds current infrastructure capacity, there may be performance bottlenecks in redemption, wallet responsiveness, or support operations. 5. Platform Integration Risk • Token functionalities rely on seamless integration within the BlockBen Wallet ecosystem. Technical issues or lack of compatibility with planned updates could affect token usability. 6. Compliance and Approval Delays • MiCA registration, transferability features, or potential secondary market access depend on regulatory milestones. Delays in approvals or unexpected changes in compliance expectations could impact implementation timelines. 7. Third-Party Dependency • The project relies on external partners for collectible production, legal services, and some IT operations. Performance, availability, or contractual issues with these vendors could introduce risk to deliverables.
I.5: Technology-Related Risks	1. Data & System Security Vulnerabilities: Loss of control over systems and personal/business data (e.g. Unauthorized access, No traceability or accountability, Inability to apply security updates or respond to incidents, Disruption of internal operations, Data loss or exposure) 2. GDPR & Data Subject Rights Gaps: Lack of legal basis, transparency, and user data handling policies 3. Incident Management Deficiencies: No structured incident response or breach notification framework (e.g. Employees don't know who to alert or what to do when something suspicious happens; There's no defined incident severity classification, escalation path, or documentation template; The company cannot meet legal deadlines 4. Backup & Recovery Gaps: No verifiable, system-independent backups 5. Access Control & Credential Weaknesses: Weak password practices and lack of secure storage 6. Deficient Role Separation and External Dependencies: Overreliance on external system administrators without proper redundancy or oversight
I.6: Mitigation measures	1. Data & System Security Vulnerabilities: Mitigation Strategies: • Implement a centralized Identity and Access Management (IAM) system with role-based permissions. • Deploy multi-factor authentication (MFA) and session logging for all critical systems. • Maintain audit trails and change logs to enable traceability (DORA Art. 9). • Enforce regular patch management and vulnerability scans. 2. GDPR & Data Subject Rights Gaps: Mitigation Strategies: • Conduct a GDPR gap assessment and implement a Record of Processing Activities (RoPA). • Create a public-facing privacy policy, with clear legal bases and purpose mapping.

	• Develop automated workflows for data subject requests (DSRs): access, rectification, erasure, etc. • Establish data retention and minimization policies for all personal data types. • Log all consents and user actions using cryptographic proof where possible (e.g., hash chains). 3. Incident Management Deficiencies: Mitigation Strategies: • Draft and approve a formal Incident Response Policy with defined roles and escalation matrix. • Set up an Incident Management Team (IMT) and assign a Security Officer. • Define incident severity levels and expected timelines (e.g., GDPR 72-hour rule). • Run simulation exercises and tabletop testing quarterly. 4. Backup & Recovery Gaps: Mitigation Strategies: • Use immutable, encrypted backups, stored outside primary infrastructure. • Automate daily incremental and weekly full backups. • Schedule quarterly disaster recovery tests and document restore times (RTO/RPO). • Assign accountability to a Business Continuity Lead (DORA Art. 11–12). 5. Access Control & Credential Weaknesses: Mitigation Strategies: • Implement a secure password vault (e.g., Bitwarden, HashiCorp Vault). • Enforce password rotation, complexity rules, and account lockout on failed attempts. • Enable role-based access controls (RBAC) tied to a centralized IAM system. • Review access rights quarterly and conduct privilege minimization reviews. • Educate staff with cybersecurity training on phishing and credential hygiene. 6. Deficient Role Separation and External Dependencies: Mitigation Strategies: • Develop an internal IT competency framework and assign in-house technical leads. • Require multi-person access approvals (four-eyes principle) for system changes. • Define service level agreements (SLAs), audit rights, and breach obligations in all third-party contracts. • Build and cross-train a replacement plan for all external critical roles. Monitor critical third-party services under a Third-Party Risk Management Policy (DORA Art. 28–31).

Part J - Information on the sustainability indicators in relation to adverse impact on the climate and other environment-related adverse impacts	
General information	
S.1: Name	BlockBen SIA
S.2: Relevant legal entity identifier	254900BBV7FA7LUG5913
S.3: Name of the crypto- asset	Holoverz (3DHT)
S.4: Consensus Mechanism	Holoverz (3DHT) is issued on the proprietary BlockBen (Qantrum) blockchain, which operates using a hybrid, permissioned consensus model. The validation of

	transactions is carried out by authorized nodes under strict internal governance policies, ensuring integrity, speed, and compliance with regulatory requirements. Qantrum is optimized for private ledger applications and is not reliant on mining or energy-intensive operations.
S.5: Incentive Mechanisms and Applicable Fees	Burning Mechanism: • 3.25% of the global revenue from holographic product sales by the production partner (Gicouranian Ltd.) is used to buy back and burn Holoverz tokens. This reduces circulating supply and aims to increase token scarcity over time. Collector Item Redemption Tiers: • Buyers can redeem tokens for exclusive holographic card boxes at tiered levels (Basic, Silver, Gold, Platinum, Black), each with added benefits like exemptions from inactivity fees for up to 24 months. Marketing and Catch-Up Bonuses: • Special marketing bonuses and catch-up commissions are allocated based on competitive tasks or when roles in the referral chain shift, ensuring continued motivation across participants
S.6: Beginning of the period to which the disclosure relates	1 January 2024
S.7: End of the period to which the disclosure relates	31 December 2024
Mandatory key indicator on energy consumption	
S.8: Energy consumption	62 kWh per year
S.9: Energy consumption sources and methodologies	The energy consumption and associated carbon emissions data presented herein are derived from the AWS Customer Carbon Footprint Tool, which calculates the environmental impact of AWS infrastructure services utilized by BlockBen SIA. This analysis specifically covers the period from January to August 2024, with figures proportionally annualized to reflect a full-year estimate. The AWS methodology considers actual service usage—in this case, Amazon EC2 instances only—and accounts for the regional carbon intensity of the hosting location (EU Central – Frankfurt). For the reporting period, AWS reported 0.004 tCO_2e emissions attributable to BlockBen's EC2 usage. To estimate total energy consumption (in line with MiCAR Section S.8), we applied AWS's regional carbon intensity factor for EMEA (~0.013 $kgCO_2e/kWh$). Based on this, the reported emissions correspond to an estimated annual electricity consumption of approximately 308 kWh. This consumption figure was allocated proportionally according to transaction activity: 20% to Holoverz (3DHT). *Note: The AWS Carbon Footprint Tool currently reflects zero values from September 2024 onwards, which is presumed to result from delayed data release or quarterly reporting practices. Therefore, this disclosure relies on the most recent 8-month data and applies proportional extrapolation to complete the annual estimate.*
Supplementary key indicators on energy and GHG emissions	
S.10: Renewable energy consumption	99%
S.11: Energy intensity	0.062 kWh/Transaction
S.12: Scope 1 DLT GHG emissions – Controlled	0 tCO2e (no physical infra). No Scope 1 emissions are reported, as Blockben operates no on-premises infrastructure, vehicles or direct energy sources. All operations are cloud-based.
S.13: Scope 2 DLT GHG emissions – Purchased	0.004 tCO2e × 20% = ~0.0008 tCO2e

S.14: GHG intensity	0.0008 kgCO2e/Transaction
Sources and methodologies	
S.15: Key energy sources and methodologies	The electricity used for token validation is sourced from Amazon Web Services (AWS) infrastructure located in the EU Central (Frankfurt) region. According to AWS sustainability disclosures, approximately 99% of the electricity used in the EMEA region is derived from renewable sources, primarily wind and solar energy. To calculate energy intensity in accordance with MiCAR requirements, token-level annual energy consumption was divided by the respective annual transaction volume. This yields a granular view of electricity usage per transaction, supporting the assessment of environmental impact on a per-asset basis.
S.16: Key GHG sources and methodologies	Greenhouse gas (GHG) emission figures are derived from the AWS Customer Carbon Footprint Tool, which reports Scope 2 emissions based on the energy consumption of AWS services used by BlockBen. Scope 1 emissions are recorded as 0 tCO_2e, as BlockBen does not operate any on-premises infrastructure or company-owned energy production. Scope 2 emissions are calculated by AWS using region-specific energy mix and intensity data and reported in metric tonnes of CO_2-equivalent (tCO_2e). AWS's methodology adheres to internationally recognized standards, including the Greenhouse Gas Protocol. While the reporting entity (BlockBen) does not hold ISO 14064 certification, all disclosed data are based on verified cloud provider metrics. For the purpose of token-level emissions disclosure: • Total Scope 2 emissions reported by AWS for the January–August 2024 period were 0.004 tCO_2e. • Emissions were proportionally allocated based on estimated transaction volume: ○ Holoverz (3DHT): 20% share = 0.0008 tCO_2e. To calculate GHG intensity (S.14), this token-specific emission value was divided by the number of annual transactions. For Holoverz, this results in an estimated 0.0008 $kgCO_2e$ per transaction.